

EXHIBIT A
FILED UNDER SEAL

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RAMESH PANDEY - 01/22/2019

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF MINNESOTA
3 CASE NO. 16-CV-1054 (WMW/DTS)
4 - - - - -
5 FAIR ISAAC CORPORATION, a Delaware Corporation,
6 Plaintiff,
7 vs.
8 Federal Insurance Company, an Indiana Corporation, et al,
9 Defendant.

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12
13 TRANSCRIPT of the stenographic notes of
14 the videotaped deposition of 30(b)(6) witness Ramesh
15 Pandey in the above-entitled matter, as taken by and
16 before LORRAINE B. ABATE, a Certified Court Reporter
17 and Notary Public of the State of New Jersey and
18 Registered Professional Reporter, held at the offices
19 of Regus, 2001 Rt. 46 East, Parsippany, New Jersey,
20 on Tuesday, January 22, 2019, commencing at 8:57
21 a.m., pursuant to Notice.

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Job No. MP-204275



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<p style="text-align: right;">Page 46</p> <p>1 in Adapt or Ezer. So these guys will say okay, I'll</p> <p>2 also support this product, like while the system is</p> <p>3 still there, Adapt and Ezer.</p> <p>4 Q. Okay.</p> <p>5 A. So team by team. Per application team.</p> <p>6 Q. Where are the team members who support</p> <p>7 Adapt and Ezer located?</p> <p>8 A. London.</p> <p>9 Q. And are you saying that they are</p> <p>10 employees of ACE American Insurance Company?</p> <p>11 A. Yes. They're employees of Chubb. Now</p> <p>12 they're part of ACE as of first of 2017.</p> <p>13 Q. Maybe -- there is a, you know, the</p> <p>14 parent company is --</p> <p>15 A. Chubb Limited.</p> <p>16 Q. -- Chubb Limited. And under Chubb</p> <p>17 Limited, are, you know, many other companies.</p> <p>18 I'll represent to you that in -- for</p> <p>19 example, one of the companies under Chubb Limited is</p> <p>20 Chubb European Group Limited.</p> <p>21 A. Yeah, let's call it.</p> <p>22 Q. Okay. But -- so I asked you about</p> <p>23 the -- who employed the London employees, the London</p> <p>24 people who support Adapt and Ezer, and my question is</p> <p>25 really directed to what specific legal entity within</p>	<p style="text-align: right;">Page 48</p> <p>1 then Adapt and Ezer in Blaze Advisor applications,</p> <p>2 they're hosted at the data center in London?</p> <p>3 A. Yes.</p> <p>4 Q. And Australia has Blaze Advisor</p> <p>5 applications, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And where is the -- similarly, is there</p> <p>8 a team of people that support the Blaze Advisor</p> <p>9 applications for the -- that support the sale of</p> <p>10 insurance in Europe? I mean, in Australia?</p> <p>11 A. No. The team in London itself, U.K. and</p> <p>12 same team supports them, too.</p> <p>13 Q. The same team, the London-based team,</p> <p>14 supports the application in Australia?</p> <p>15 A. Yeah, Adapt.</p> <p>16 Q. Okay. And to your knowledge, does</p> <p>17 Australia also use Evolution?</p> <p>18 A. No.</p> <p>19 Q. Okay. And the -- where is the data</p> <p>20 center located that supports the Blaze Advisor</p> <p>21 applications used for the sale of insurance in</p> <p>22 Australia?</p> <p>23 A. It's in London.</p> <p>24 Q. And then there are Blaze Advisor</p> <p>25 applications in Canada?</p>
<p style="text-align: right;">Page 47</p> <p>1 the large structure of Chubb Limited, do you know one</p> <p>2 way or the other?</p> <p>3 A. So it would be Chubb Europe, Chubb</p> <p>4 London. I don't know the exact name, but it will --</p> <p>5 let's call it Chubb Europe.</p> <p>6 Q. Okay.</p> <p>7 MR. FLEMING: Allen, when you get to</p> <p>8 another topic, can we take a short break. It's</p> <p>9 been over an hour.</p> <p>10 MR. HINDERAKER: Yeah. Just give me a</p> <p>11 minute here. Maybe we will.</p> <p>12 Well, we can take a break now and I can</p> <p>13 finish the topic after the break, if you'd like.</p> <p>14 THE VIDEOGRAPHER: The time is 10:03</p> <p>15 a.m., and we're going off the record.</p> <p>16 (There was a recess taken.)</p> <p>17 THE VIDEOGRAPHER: The time is</p> <p>18 10:19 a.m. and we're back on the record.</p> <p>19 BY MR. HINDERAKER:</p> <p>20 Q. Welcome back.</p> <p>21 At the break, you told us that the team</p> <p>22 that supports Adapt and Ezer in Europe is based in</p> <p>23 London, correct?</p> <p>24 A. Yep, yep.</p> <p>25 Q. Okay. And then the -- and that -- and</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Yes.</p> <p>2 Q. And by in Canada, I should be more</p> <p>3 clear.</p> <p>4 Blaze Advisor applications are used in</p> <p>5 connection with the sale of insurance policies in</p> <p>6 Canada?</p> <p>7 A. Yes.</p> <p>8 Q. And --</p> <p>9 MR. FLEMING: Allen, what topic are you</p> <p>10 questioning about?</p> <p>11 MR. HINDERAKER: It doesn't matter.</p> <p>12 MR. FLEMING: Well, unless it is not a</p> <p>13 topic.</p> <p>14 MR. HINDERAKER: I'm asking him his</p> <p>15 knowledge -- we're following up -- we are</p> <p>16 following up on the use of Blaze Advisor in the</p> <p>17 current environment of, I'll call it Chubb</p> <p>18 Limited. And so I was asking Mr. Pandey</p> <p>19 regarding Blaze Advisor applications used in</p> <p>20 support of insurance companies in Canada,</p> <p>21 correct?</p> <p>22 Q. And the team, and you -- can you</p> <p>23 remember the names of the applications that support</p> <p>24 the sale of insurance in Blaze Advisor in Canada?</p> <p>25 A. So Renaissance, R-E-N-A-I-S-S-A-N-C-E,</p>

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<p style="text-align: right;">Page 50</p> <p>1 Renaissance.</p> <p>2 Q. And I would call it Remnaissance.</p> <p>3 A. Yeah.</p> <p>4 Q. And any other applications that are</p> <p>5 using Blaze Advisor in Canada, to your knowledge?</p> <p>6 A. Evolution. Which, behind the scene</p> <p>7 using Renaissance. The name is Evolution, which is a</p> <p>8 front end of user interface. Behind scene uses</p> <p>9 Renaissance.</p> <p>10 Q. Renaissance. And the team that supports</p> <p>11 the Evolution application in Canada, is that -- where</p> <p>12 is that team located?</p> <p>13 A. In Toronto, Canada.</p> <p>14 Q. Okay. And would it be fair to say</p> <p>15 that -- well, to your knowledge, do you know the</p> <p>16 legal entity that employs that team?</p> <p>17 A. Not 100 percent sure, but it's Federal,</p> <p>18 probably.</p> <p>19 Q. Or some Chubb Canada legal entity?</p> <p>20 A. Legally, it's Federal, because it's a --</p> <p>21 Canada and U.S. have a lot of business in borders,</p> <p>22 Toronto, Buffalo, those two, Federal, but not</p> <p>23 100 percent sure.</p> <p>24 Q. All right. And the -- that team is</p> <p>25 located in Toronto?</p>	<p style="text-align: right;">Page 52</p> <p>1 the difference.</p> <p>2 Q. All right. In topics 6 and 7, one of</p> <p>3 the topics asks for the identification by name of the</p> <p>4 Blaze Advisor applications that are -- that ACE</p> <p>5 American uses in support of, you know, Federal, for</p> <p>6 the sale of insurance.</p> <p>7 And rather than go through each one of</p> <p>8 those applications individually, would it be accurate</p> <p>9 to say that ACE American Insurance Company now</p> <p>10 supports all of the applications that use Blaze</p> <p>11 Advisor, being the same applications that Chubb &</p> <p>12 Son, a Division of Federal, supported?</p> <p>13 A. I'll say I'm fairly -- I'll say yes,</p> <p>14 but -- with my knowledge, yes. But it could be other</p> <p>15 companies, too.</p> <p>16 Q. Have any -- have any products of -- by</p> <p>17 products, I mean insurance policies, have any</p> <p>18 products of legacy ACE -- let me ask it differently.</p> <p>19 Do any Blaze Advisor applications</p> <p>20 support the sale of legacy ACE products?</p> <p>21 A. No.</p> <p>22 Q. Let me turn to topic 8.</p> <p>23 And as you see, it asks for use by</p> <p>24 Federal of Blaze Advisor applications in connection</p> <p>25 with insurance policies issued in the name of ACE</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Yes.</p> <p>2 Q. And the data center that hosts the Blaze</p> <p>3 Advisor applications for Evolution that support the</p> <p>4 sale of insurance in Canada is located in Toronto as</p> <p>5 well?</p> <p>6 A. No. It's North Carolina, Raleigh.</p> <p>7 Raleigh, North Carolina.</p> <p>8 Q. So that application, then, has been</p> <p>9 migrated to Raleigh, North Carolina?</p> <p>10 A. Yes.</p> <p>11 Q. And before the migration, it was hosted</p> <p>12 in the Toronto data -- the data center in Toronto?</p> <p>13 A. I don't think so, but not 100 percent</p> <p>14 sure.</p> <p>15 Q. Don't know?</p> <p>16 A. But I know that it's Raleigh. Raleigh</p> <p>17 data center we have a long time, so...</p> <p>18 Q. So is ACE American -- are the employees</p> <p>19 of ACE American Insurance Company involved in</p> <p>20 supporting the Evolution application used in</p> <p>21 connection with the sale of insurance in Canada, if</p> <p>22 you know?</p> <p>23 A. Not 100 percent. It's ACE insurance,</p> <p>24 but ACE Canada, I don't know if it's one company or</p> <p>25 ACE American, ACE Canada American. I'm not sure of</p>	<p style="text-align: right;">Page 53</p> <p>1 American, and let me break this down into some</p> <p>2 further detail.</p> <p>3 As I understand the facts, once the --</p> <p>4 when the employees of Chubb & Son, a Division of</p> <p>5 Federal, became employees of ACE American, January 1,</p> <p>6 2017, then Federal itself was not supporting Blaze</p> <p>7 Advisor applications, correct?</p> <p>8 A. Yeah. ACE, yeah.</p> <p>9 Q. ACE American was doing that, correct?</p> <p>10 A. Yes. Starting that date, 1st</p> <p>11 January 2017.</p> <p>12 Q. Before January 1, 2017, to your</p> <p>13 knowledge, was Federal supporting the sale of ACE</p> <p>14 American Insurance policies using Blaze Advisor</p> <p>15 applications?</p> <p>16 A. No, no. Chubb never did that. They're</p> <p>17 two separate companies.</p> <p>18 Q. And there was this year period between</p> <p>19 2016 and 2017 when -- it's post-merger, after they</p> <p>20 become a new company, but before Chubb & Son</p> <p>21 employees become Ace American employees, during that</p> <p>22 one-year period of time, did Federal Insurance with</p> <p>23 Blaze Advisor applications support the sale of</p> <p>24 policies issued by ACE American or its subsidiaries?</p> <p>25 A. No, no, no.</p>

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<p style="text-align: right;">Page 54</p> <p>1 Q. Turning to topic 9, I want to ask some</p> <p>2 questions about Chubb European Group Limited.</p> <p>3 Are you familiar with that company?</p> <p>4 A. Chubb European, yes.</p> <p>5 Q. What did you do to prepare yourself to</p> <p>6 respond to topic 9 today?</p> <p>7 A. So I talked to Mike Hutchinson, Claudio.</p> <p>8 Q. Claudio's last name?</p> <p>9 A. G-H-I, Ghislangon, Johnnie,</p> <p>10 G-H-I-S-L-A-N-G-O-N, I think.</p> <p>11 Q. All right. What other Blaze Advisor</p> <p>12 software applications used in connection with</p> <p>13 insurance policies issued in the name of any legal</p> <p>14 entity of Chubb European Group Limited?</p> <p>15 A. So there are two applications. Ezer,</p> <p>16 E-G-E-R, (sic), as we talked earlier, and Adapt.</p> <p>17 Q. Okay. And do you know the name of the</p> <p>18 legal entities that are part of Chubb European Group</p> <p>19 Limited?</p> <p>20 A. I thought that's only one, Chubb</p> <p>21 European Limited.</p> <p>22 Q. And I'm just --</p> <p>23 A. I might not be exactly correct, but</p> <p>24 that's what I thought.</p> <p>25 Q. Understood. My understanding is that</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Only U.K., United Kingdom.</p> <p>2 Q. Not Italy, not Germany, not --</p> <p>3 A. They have different rules. Every</p> <p>4 country have their own rules and regulations.</p> <p>5 Q. And do you know the date or approximate</p> <p>6 date that Ezer was first used in Europe?</p> <p>7 A. You're talking about prior to merger?</p> <p>8 Q. Yes, I am.</p> <p>9 A. Well, I can say 2012.</p> <p>10 Q. But you don't know?</p> <p>11 A. Not 100 percent.</p> <p>12 Q. All right. And how about Adapt, when</p> <p>13 was that first used?</p> <p>14 A. Same time. It's either 2011 or 2012,</p> <p>15 one of those dates.</p> <p>16 Q. And then on 9. b), you've told us that</p> <p>17 the servers are located in London?</p> <p>18 A. Yes.</p> <p>19 Q. And then 9. c), other than the</p> <p>20 general -- do you know the specific company in which</p> <p>21 the persons who support Ezer and Adapt in Europe</p> <p>22 are -- by whom they're employed?</p> <p>23 A. I only know Chubb European Group.</p> <p>24 Q. Okay. 9. d), as you see, makes</p> <p>25 reference to a different legal entity being Chubb</p>
<p style="text-align: right;">Page 55</p> <p>1 Chubb European Group Limited is made up of a number</p> <p>2 of different companies.</p> <p>3 A. Not for this small project. There are</p> <p>4 Chubb European sales, a lot of stuff. This part is</p> <p>5 only small, very small.</p> <p>6 Q. Anyway, the answer to my question is do</p> <p>7 you know the name of each legal entity that is part</p> <p>8 of Chubb European Group Limited?</p> <p>9 A. Not all of them, no.</p> <p>10 Q. Do you know any of them?</p> <p>11 A. The Chubb European Group Limited was the</p> <p>12 one I thought. That's the one which supports Ezer</p> <p>13 and Adapt.</p> <p>14 Q. All right. Do you know when Adapt was</p> <p>15 first used -- let me back up.</p> <p>16 Do you know what countries Chubb</p> <p>17 European Group Limited sells insurance policies into?</p> <p>18 A. Chubb Europe? The only applications --</p> <p>19 can you be specific.</p> <p>20 Q. Sure, let me just use -- let's just use</p> <p>21 Adapt. I'll do them together, Adapt and Ezer.</p> <p>22 A. Yeah.</p> <p>23 Q. What European countries are insurance</p> <p>24 policies sold in that are supported by Adapt and</p> <p>25 Ezer?</p>	<p style="text-align: right;">Page 57</p> <p>1 Insurance of Europe SE.</p> <p>2 Understanding -- so then with that</p> <p>3 reference in mind, is it fair to say that whether --</p> <p>4 whether, under the legal entity of Chubb Insurance of</p> <p>5 Europe SE, or under the legal entity of Chubb</p> <p>6 European Group Limited, those dates of first use for</p> <p>7 Ezer or Adapt are accurate?</p> <p>8 A. So you're saying when they start using</p> <p>9 it or when they stop using it?</p> <p>10 Q. No, when they started.</p> <p>11 A. Started, the same thing. 2012.</p> <p>12 Q. The same date you gave me? Thank you.</p> <p>13 I'm going to -- let me set my question</p> <p>14 up by representing to you the entity called Chubb</p> <p>15 Insurance of Europe SE no longer exists, and it was</p> <p>16 merged into Chubb European Group Limited.</p> <p>17 Do you know if there is any difference</p> <p>18 in the scope of products that Ezer and Adapt support</p> <p>19 between the use by Chubb Insurance of Europe SE and</p> <p>20 the use by Chubb European Group Limited?</p> <p>21 A. We stopped -- because the company Chubb</p> <p>22 Insurance of Europe SE, we start -- we're getting rid</p> <p>23 of, and they're the one who are using Adapt and Ezer.</p> <p>24 Chubb European Group Limited doesn't use the product</p> <p>25 in Ezer and Adapt any more because they have their</p>